

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

LIGHT OF THE WORLD GOSPEL)	Case No. 8:18-cv-312
MINISTRIES, INC.,)	
)	
Plaintiff,)	
)	
v.)	JOINT MOTION TO EXTEND STAY
)	OF PROCEEDINGS
VILLAGE OF WALTHILL, NEBRASKA,)	
)	
Defendant.)	

COME NOW the parties, Plaintiff Light of the World Gospel Ministries, Inc. (“LOTW”) and Defendant Village of Walthill, Nebraska (“Walthill” or the “Village”), and hereby jointly request a continuance of the stay of progression deadlines and proceedings entered by the Court. In support of this motion, the parties jointly show the Court:

1. This Court previously granted a joint motion to stay pending mediation on March 5, 2021. (Text Order, Filing No. 159.)
2. The parties participated in private mediation with Michael G. Mullin on February 27, 2021 and March 3, 2021. At the conclusion of the mediation, the parties agreed on a pathway to settle both this case and No. 8:20-cv-69.
3. The anticipated settlement involves a proposed consent decree in each case and a separate contractual agreement in this case.
4. The parties have exchanged multiple versions of these documents and continue to negotiate in good faith on the remaining issues. However, some points of disagreement remain.
5. The parties need more time to finalize the terms of the proposed decrees and agreements.

6. If the parties are unable to reach agreement, they may return to mediation prior to recommencing litigation.

7. The parties desire to stay all discovery, motion, and other deadlines in the case to give the parties an opportunity to complete their settlement negotiations.

WHEREFORE, the parties jointly request that this Court continue the stay of all discovery, motion, and other deadlines in this case until August 6, 2021, for the reasons set forth above.

DATED this 1st day of June, 2021.

[SIGNATURES ON NEXT PAGE.]

Respectfully submitted,

VILLAGE OF WALTHILL, NEBRASKA,
Defendant,

LIGHT OF THE WORLD GOSPEL
MINISTRIES, INC, Plaintiff,

By:

s/ Jason W. Grams

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing joint motion to stay pending mediation has been filed in the Court's CM/ECF system which will effect service upon all counsel of record on this 1st day of June, 2021. The following individuals will be served with this document via regular US Mail, postage prepaid:

Bradley Irwin

615 6th Avenue

South Sioux City, NE 68776

s/ Jason W. Grams

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